

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION,)	
)	
)	No. 23 CV 14021
Plaintiff,)	
v.)	Judge Sunil R. Harjani
)	
UNITED PARCEL SERVICE, INC.)	Magistrate Judge Gabriel Fuentes
)	
Defendant.)	
=====)	
)	
KURT BERNABEI,)	
)	
Plaintiff-Intervenor.)	

JOINT MOTION FOR ENTRY OF AGREED CONFIDENTIALITY ORDER

Plaintiff the Equal Employment Opportunity Commission (“EEOC”), Plaintiff-Intervenor Kurt Bernabei, and Defendant United Parcel Service, Inc., an Ohio corporation (“UPS”), pursuant to Federal Rule of Civil Procedure 26(c), jointly move to enter the attached Agreed Confidentiality Order and state as follows:

1. The EEOC and Intervenor-Plaintiff Bernabei bring claims against UPS under the Americans with Disabilities Act.

2. The parties anticipate that they will need to produce confidential and sensitive information relating to these claims, including, but not limited to, information related to individuals’ medical conditions and financial information, personnel records for individuals involved in this lawsuit and others with no involvement, and certain UPS corporate business records that are maintained as confidential and protected from disclosure to third parties. The parties have an interest in protecting such confidential information.

3. The proposed Confidentiality Order is the Form Local Rule 26.2 Model Confidentiality Order with the parties' revisions to this form tracked in the document attached as Exhibit A. A clean version of the proposed order has also been submitted by email to Proposed_Order_Fuentes@ilnd.uscourts.gov contemporaneously with the filing of this Motion.

4. The proposed Confidentiality Order governs the parties' use of the documents produced and does not require the Court to keep any information confidential. Nor does it require that any item be filed under seal. Rather, in order to file a document under seal, the relevant party must comply with Local Rule 26.2.

WHEREFORE, the parties jointly request that this Court enter the attached Confidentiality Order.

Respectfully submitted,

DATE: May 28, 2024

WE SO MOVE

and agree to abide by the terms of this Order

UNITED PARCEL SERVICE, INC.

By: s/Gary R. Clark

Gary R. Clark (ARDC #6271092)
Quarles & Brady LLP
300 N. LaSalle St., Ste. 4000
Chicago, IL 60654
(312) 715-5000
(312) 715-5155 (fax)
Gary.Clark@Quarles.com

WE SO MOVE

and agree to abide by the terms of this Order

U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION

By: s/Laurie Elkin, w/permission

Laurie Elkin
U.S. Equal Employment
Opportunity Commission
Chicago District Office
230 S. Dearborn Street, Ste. 2920
Chicago, IL 60304
laurie.elkin@eeoc.gov

WE SO MOVE

and agree to abide by the terms of this
Order

KURT BERNABEL, Plaintiff-Intervenor

By: *s/Paul W. Mollica,*
w/permission

Paul W. Mollica
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